

**NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP**

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October 4, 2017

**By Electronic Mail and First Class Mail**

Ms. Sheri L. Bianchin  
Remedial Project Manager  
Institutional Controls Coordinator  
U.S. Environmental Protection Agency Region 5  
77 West Jackson Boulevard (SR-6J)  
Chicago, IL 60604

**Re: NL Industries/Taracorp Superfund Site; Granite City, Illinois  
Consent Decree – Quarterly Progress Report 47 (July-September 2017)**

Dear Ms. Bianchin:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the “site”), two copies of this letter are submitted, on behalf of the NL Industries/Taracorp Superfund Site Group (“Group”), to provide the U.S. Environmental Protection Agency (“EPA”) with a quarterly progress report for activities performed during the period from July-September 2017.

**1. Actions Taken During Previous Quarter to Comply with the Consent Decree:**

- **Residential Soil Remediation:** In July 2017, the Group's project coordinator submitted the report, titled Remedial Action Report, to EPA. The report was prepared by the Group's remedial action contractor, Environmental Works, Inc. (“EWI”), to document the completion of residential soil remediation activities performed at the site from 2015 to 2017.
- **Contingency Measures:** For use by Illinois EPA in assisting EPA in the implementation of contingency measures at the site and in response to a request from Illinois EPA, the Group's project coordinator sent an email to Illinois EPA on August 2, 2017 to provide: (1) ENTACT's Sampling and Analysis Plan; (2) ENTACT's Quality Assurance Project Plan; (3) EWI's Health and Safety/ Contingency Plan; (4) EWI's Sampling and Analysis Plan Addendum; and (5) EWI's Quality Assurance Project Plan Addendum.
- **Supplemental Environmental Project (SEP):** In July 2017, the Group received a letter from EPA indicating that EPA had reviewed the SEP Completion Report and requiring the Group to pay the unspent SEP funds to EPA. Following additional communications and an agreement among the Group, EPA, and the U.S. Department of Justice (“DOJ”), the Group paid a portion of the unspent SEP funds to EPA in August 2017.

- **EPA Audit Reconciliation Bill:** In August 2017, the Group paid its share of EPA's audit reconciliation bill pursuant to the Consent Decree.
- **Institutional Controls:** The Group continued to update the draft Institutional Controls Work Plan. The Group also initiated efforts to prepare revised draft environmental covenants to address the new Illinois model environmental covenant that EPA provided to the Group in June 2017. In August 2017, the Group sent an email to EPA to provide draft environmental covenants for Taracorp's (16<sup>th</sup> Street) property and the NL Industries Generator Site Group, LLC's (1555 State Street) property and to request EPA's approval.
- **Operation and Maintenance:** At the request of EPA, the Group continued efforts to update the Operation and Maintenance Plan. In addition, the Group's project coordinator sent a memorandum to EPA in August 2017 to provide EPA's post-remediation data for six remote fill properties and to request a determination from EPA that operation and maintenance activities and institutional controls are not necessary, or can be waived by EPA, for the six properties. Also, the following operation and maintenance activities were performed at the site during the July-September 2017 period:

August 4	The Group's contractor, Munie Greencare Professionals ("Munie"), cut the vegetation on the 1555 State Street property and surrounding areas at the site.
September 21	The Group's project coordinator communicated with Munie personnel and confirmed that Munie planned to cut the vegetation on the Taracorp pile and 1555 State Street properties during the week of October 1, 2017, weather permitting.
September 21	The Group's project coordinator confirmed that All Pallet Services, the occupant of the 1459 State Street property, retained a contractor who performed work at the site in September 2017 to straighten the fence posts around the perimeter of the Taracorp pile that had been previously damaged from pallet handling activities.

- **Project Coordination:** During the July-September 2017 period, the Group's project coordinator communicated with the following parties regarding work at the site:

July 6	Submitted Quarterly Progress Report 46 to EPA.
July 12	Received EPA's letter indicating that EPA had reviewed the SEP Completion Report and requiring the Group to pay the unspent SEP funds to EPA.
July 14	Sent a letter to EPA to provide EWI's Remedial Action Report, documenting the completion of residential soil remediation activities performed at the site from 2015 to 2017.
August 2	In response to a request from Illinois EPA and for use related to contingency measures activities, sent an email to Illinois EPA to provide: (1) ENTACT's Sampling and Analysis Plan; (2) ENTACT's Quality Assurance Project Plan; (3) EWI's Health and Safety/Contingency Plan; (4) EWI's Sampling and Analysis Plan Addendum; and (5) EWI's Quality Assurance Project Plan Addendum.
August 7	Sent a memorandum to EPA to provide EPA's post-remediation soil sampling data for six remote fill properties and to request a determination from EPA that operation and maintenance activities and institutional controls are not necessary, or can be waived by EPA, for the six properties.

August 10	Sent an email to EPA to provide draft environmental covenants for Taracorp's (16 <sup>th</sup> Street) property and the NL Industries Generator Site Group, LLC's (1555 State Street) property and to request EPA's approval.
August 11	Received a copy of the communication from Johnson Controls, Inc.'s counsel to EPA and DOJ confirming that the Group's wire transfer of funds had been completed in partial satisfaction of the SEP balance pursuant to the Group's agreement with EPA and DOJ.
August 23	Sent an email to EPA to provide revised draft versions of the environmental covenants for Taracorp's (16 <sup>th</sup> Street) property and the NL Industries' Generator Site Group, LLC's (1555 State Street) property and to request EPA's approval.
August 29	Participated in a portion of the Group's conference call with EPA and DOJ related to SEP expenditures.
September 22	Spoke to EPA's project manager regarding institutional controls, environmental covenants, and related matters.
September 26	Received information from Illinois EPA's new project manager and provided contact information, etc.

**2. Summary of Data and/or Results of Sampling and Tests Received:**

- As indicated above, the Group's project coordinator submitted EWI's Remedial Action Report to EPA in July 2017. The report included the data and results of sampling performed by EWI during the completion of residential soil remediation activities at the site from 2015 to 2017.

**3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Quarter:**

- As indicated above, the Group's project coordinator submitted EWI's Remedial Action Report to EPA in July 2017.

**4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- The Group will continue to perform operation and maintenance activities at the site, as required. The Group's lawn maintenance contractor, Munie, will cut the vegetation on the 1555 State Street property and Taracorp pile, as necessary. Also, an inspection will be performed at the site during the October-December 2017 period.
- The Group expects to pay the remaining portion of the unspent SEP funds to EPA in October 2017.
- The Group's project coordinator will continue to update the Operation and Maintenance Plan.
- The Group will address comments or questions, if any are received from EPA, regarding the six remote fill properties addressed in the Group's August 2017 memorandum.

- The Group will address comments, if any are received from EPA, on EWI's Remedial Action Report, which was submitted to EPA in July 2017 to address the completion of residential soil remediation activities performed at the site in 2015 to 2017.
- The Group will address comments or questions from EPA, if any are received, on the Visual Canvassing Report and the Contingency Measures Work Plan, which were submitted to EPA in January 2017.
- The Group will update the Institutional Controls Work Plan and will address comments, if any are received from EPA, on the Institutional Controls Work Plan previously submitted to EPA. In addition, the Group will address comments, if any are received from EPA, on the draft environmental covenants for Taracorp Inc.'s 16<sup>th</sup> Street property and the NL Industries Generator Site Group L.L.C.'s 1555 state Street property, which were submitted to EPA in August 2017.
- The Group will address comments, if any are received from EPA, in regard to the Five-Year Review Groundwater Monitoring Report, which was submitted to EPA on August 11, 2014 to summarize the results of the April 2014 groundwater monitoring event.
- The Group will address comments, if any are received from EPA, in regard to: (1) the Soil Sampling and Analysis Report, which was submitted to EPA in January 2014 to document the results from soil sampling activities at 73 residential properties in April – May 2011, September 2012, June 2013, and October 2013; (2) the Soil Sampling and Analysis Report Addendum, which was submitted to EPA in December 2015 to document the results of soil sampling performed on three residential properties Non-Responsive Non-Responsive in June 2015 and one residential property Non-Responsive in November 2015; and (3) the Soil Sampling and Analysis Report Addendum No. 2, which was submitted to EPA in September 2016 to document the results of soil sampling activities performed on three residential properties Non-Responsive in August 2016.

**5. Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- Not applicable for this reporting period.

**6. Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- Not applicable for this reporting period.

**7. Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- Not applicable for this reporting period.

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Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

**LEED ENVIRONMENTAL, INC.**

A handwritten signature in black ink, appearing to read "Jeffrey A. Leed". The signature is fluid and cursive, with the first name "Jeffrey" being more prominent.

Jeffrey A. Leed  
Project Coordinator

cc: Nicole Wood-Chi, Esq. – U.S. Environmental Protection Agency (by electronic mail)  
Christopher Grubb, Esq. – U.S. Environmental Protection Agency (by electronic mail)  
Mr. Brian Conrath - Illinois EPA (by electronic mail and first class mail)  
Mr. Tom Miller – Illinois EPA (by electronic mail)  
Technical Committee, NL Industries/Taracorp Superfund Site Group (by electronic mail)